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Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Public Comment on FCC GN Docket No. 25-133 – Potential Impact on the Amateur Radio Service (47 CFR Part 97)

To Whom It May Concern,

I write to submit this public comment regarding GN Docket No. 25-133, titled "In Re: Delete, Delete, Delete," and its potential ramifications for the Amateur Radio Service (47 CFR Part 97). As a deeply engaged member of the telecommunications and cybersecurity community, I wish to highlight the essential role that amateur radio plays in advancing the public interest and urge the Commission to ensure that any proposed regulatory changes do not curtail or eliminate this vital service.

Amateur Radio's Critical Role in Emergency Communications

The Amateur Radio Service provides an indispensable public good, particularly in the realm of disaster preparedness and emergency response. Unlike commercial communications infrastructure, which is susceptible to failure during crises, amateur radio operators offer resilient, decentralized, and self-sustaining communication networks that have been proven effective in disaster scenarios. Organizations such as the Amateur Radio Emergency Service (ARES) and Radio Amateur Civil Emergency Service (RACES) routinely partner with federal, state, and local agencies to provide reliable communications during hurricanes, wildfires, earthquakes, and other emergencies. Any regulatory action that undermines the ability of amateur radio operators to continue this essential work would significantly **weaken national emergency preparedness** and **increase reliance on fragile commercial infrastructure.**

Amateur Radio Is an Incubator of Technical Innovation

The Amateur Radio Service has historically been at the forefront of technical innovation in radio frequency (RF) communications. Many advancements in spectrum use, including early developments in digital packet radio, software-defined radio (SDR), and even satellite communications, have emerged from the amateur radio community. Experimental licensing under Part 97 fosters hands-on learning and real-world testing, contributing significantly to broader advancements in telecommunications, aerospace, and defense technologies. Limiting or eliminating amateur radio allocations would **stifle this innovative ecosystem** and **reduce the pipeline of future engineers and technologists.**

Amateur Radio's Key Role in Workforce Development and STEM Education

Amateur radio provides an essential training ground for individuals pursuing careers in electrical engineering, cybersecurity, and telecommunications. The licensing framework under Part 97 serves as a gateway to

technical education, enabling individuals—many of whom are young students—to gain hands-on experience in RF propagation, digital communication, and network resilience. Amateur radio operators often advance into critical technical roles in industries that rely on radio communications, including aerospace, defense, and public safety. Eroding the **availability of amateur radio spectrum** would diminish an **important pipeline of highly skilled professionals**, negatively impacting the U.S.'s technological competitiveness and national security.

Risks of Spectrum Curtailment and Reallocation

In my view, a significant risk associated with GN Docket No. 25-133 is that it could provide an opportunity for the reallocation of amateur radio spectrum under the guise of regulatory modernization. Industry stakeholders with commercial interests in spectrum utilization may use this proceeding as a mechanism to push for the auctioning or repurposing of amateur radio bands, significantly reducing the availability of usable frequencies for licensed operators. This would allow the FCC to maintain that an Amateur Radio Service still exists in principle, while **functionally rendering it negligible due to insufficient spectrum allocations.**

The consequences of such curtailment would be severe:

1. **Public safety communications would suffer**, as the ability of amateur operators to provide emergency communications support would be compromised.

2. **Technical innovation in spectrum use would decline**, as the experimental and educational aspects of amateur radio would be restricted to a few narrow bands, limiting future advancements in RF technologies.

3. **The national pool of RF-trained professionals would shrink**, reducing the availability of skilled engineers and technologists for industries that depend on radio communications, including aerospace, defense, and telecommunications.

If spectrum reallocation were to proceed unchecked, amateur radio could be reduced to a **token allocation with negligible value**, preventing it from fulfilling its established roles in public service, innovation, and technical training.

Policy Recommendations

Given the above considerations, I respectfully urge the Commission to:

1. Ensure that GN Docket No. 25-133 does not result in the elimination or undue restriction of the Amateur Radio Service.

2. Protect existing amateur radio spectrum allocations to preserve its public safety, educational, and experimental benefits.

3. Recognize amateur radio as a critical national asset in emergency communications and STEM workforce development.

4. Engage with the amateur radio community to fully assess the potential impacts of any proposed regulatory changes before taking further action.

5. Reject any efforts to reallocate amateur radio spectrum for commercial use under the pretext of modernization or efficiency, ensuring that amateur radio remains viable as a public service and technical incubator.

Conclusion

The Amateur Radio Service is a unique and irreplaceable national resource that contributes substantially to public safety, technical innovation, and workforce development. Any policy that weakens or eliminates this service would not only harm the public interest but also diminish the nation's overall emergency preparedness and technical capabilities. I strongly encourage the Commission to carefully consider the broad and tangible benefits provided by amateur radio and to protect its continued operation within the U.S. telecommunications landscape.

Thank you for your time and consideration. I look forward to the Commission's careful review of this matter.

Respectfully submitted,

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